

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS**

KELLY BLAND, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

LIGHTBEAM LENDING INC. AND
CLEAN ENERGY ASSOCIATES, LLC

Defendants.

Case No. 4:24-cv-00595

JURY TRIAL DEMANDED

**REQUEST FOR ENTRY OF DEFAULT AGAINST DEFENDANT
LIGHTBEAM LENDING INC.**

COMES NOW Plaintiff Kelly Bland, by and through the undersigned counsel, pursuant to FED. R. CIV. P. 55(a), and hereby files this Motion for Clerk's Entry of Default against Defendant LIGHTBEAM LENDING INC. in the above-styled action. Plaintiff respectfully requests that the Clerk of Court enter default as the Defendant has failed to serve or file an answer to Plaintiff's claims in this action within the time permitted by law or otherwise.

Federal Rule of Civil Procedure 12(a), entitled "Time to Serve a Responsive Pleading," provides in pertinent part that "[a] defendant must serve an answer within 21 days after being served with the summons and complaint." FED. R. CIV. P. 12(a)(1)(A)(i). Federal Rule of Civil Procedure 55(a), entitled "Entering a Default," provides that "[w]hen a party against whom a judgment for affirmative relief is sought has failed to plead or otherwise defend, and that failure is shown by affidavit or otherwise, the clerk *must* enter the party's default." FED. R. CIV. P. 55(a) (emphasis added).

Here, the Plaintiff filed her Complaint naming Defendant on June 29, 2024. (See ECF No.1.) Defendant was served on July 2, 2024. (See ECF No. 7.) Defendant's answer to the

complaint was due on July 23, 2024. No answer has yet been filed. Accordingly, the Plaintiff requests that the Clerk enter the Defendant's default pursuant to FED. R. CIV. P. 55(a).

CONCLUSION

WHEREFORE, for the reasons set forth herein, the Plaintiff respectfully requests that the Clerk of Court enter default against the Defendant pursuant to FED. R. CIV. P. 55(a).

RESPECTFULLY SUBMITTED AND DATED this January 13, 2025.

/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.
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Attorney for Plaintiff and proposed class

CERTIFICATE OF SERVICE

I certify that I filed the foregoing via ECF on the below date, which will automatically send a copy to all attorneys of record on the case.

I further certify that I mailed a copy of the foregoing to:

Lightbeam Lending Inc.
c/o: Sameer Sethi
427 Walnut Dr.
Murphy, TX 75094
Tracking Number: 00310903331480001206

Dated: January 13, 2025

Respectfully submitted,
/s/ Andrew Roman Perrong
Andrew Roman Perrong, Esq.